



# Waiver Wise

## Technical Assistance for the Community Options Program Waiver COP-W

Wisconsin Department of Health & Family Services • Division of Supportive Living  
Bureau of Aging & Long Term Care Resources

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### **Appendix N (formerly DCS Memo 88-30): Changes in Supportive Home Care Training Requirements**

#### **Amending DCS MEMO 88-30**

At the time of the 1995-1999 COP Waiver renewal, Wisconsin was found to be out of compliance with federal requirements. Specifically, some of the services received by frail elderly and disabled individuals did not adhere to Wisconsin's established standards for Supportive Home Care (SHC) as described in DCS Memo 88-30.

As a result, Appendix N "88-30: Standards for Supportive Home Care Service Providers" was issued in October 1999. Though not a dramatic expansion of the original policy, Appendix N outlines how Wisconsin's standards must be applied to routine chore services (housecleaning, lawn work, snow shoveling, grocery shopping, etc.). It also iterates that waiving the standards for SHC service providers is no longer acceptable.

Specifically, Appendix N clarifies policies regarding:

- *Training requirements for both in-home workers and chore service providers*
- *Exemptions from Training Requirements*
- *Documentation for Exemptions*
- *Recipients Providing Training*
- *Requirements when contracting with an agency to provide SHC*

The subtitle "88-30" was retained when the standards were expanded to include chore services since this is the common reference to these policies. The federal Health Care Financing Administration (HCFA) accepts our Waiver Manual as policy. A new numbered memo was not necessary. The state/county contract requires county compliance with the Waiver Manual.

This TA document was developed to help county agencies with the interpretation of the amended policy. It also provides examples of how several county agencies are incorporating these changes into their approach to training supportive home care providers.

This document is not to be viewed as the official policy. The official policy regarding supportive home care services can be found in the MA Waivers Manual, Appendix N, pp. 193-194.

### **Training Requirements**

Supportive home care workers providing hands-on care and chore services must be trained in the following areas:

- Orientation to policies and procedures of the county and/or contract agency
- Information about the specific disabilities of the participants to be served
- Recognizing and appropriately responding to medical and safety emergencies
- Interpersonal and communication skills
- Personal hygiene needs
- Homemaking and household services

Each SHC provider must complete the required training within six-months of beginning employment with the provider agency or the participant.

### **Exemptions from Training Requirements**

County agencies may exempt service providers from specific training requirements for the following reasons:

- The prospective SHC provider has comparable knowledge and experience in any of the six required training areas, and this information is documented in the participant or agency file.
- The recipient or guardian functioning as employer is willing and in the county agency's judgment able to provide all or part of the required training.
- The SHC provider is not required to provide certain services.
- The SHC provider is a Medicaid certified personal care worker, a home health aid, a registered nurse, or a licensed practical nurse. In instances where a SHC worker is certified as an OT, PT, COTA, or CPTA, similar exemptions apply as long as documentation is available to prove comparability of training.

### **Documentation for Exemptions**

- Exemptions for each of the six training components must be described in detail and documented in the participant's case record or another accessible place in the county or contract agency.
- In the event that a provider is a Medicaid certified personal care worker, a home health aid, or a licensed practical nurse, documentation of comparability of training must be available when county programs are monitored or reviewed.

### **Recipient's Providing Training**

If recipients are willing and capable of providing training to their service providers, the following requirements must be met:

- Documentation of the recipient providing training is placed in participant or agency record
- Recipient must provide and sign a list of training areas to be provided by the recipient. This list is placed in the participant or agency file. (Please see Sample 4 for an example of Ozaukee County's Recipient Training Checklist.)
- If the participant is not an employer, the employer agency will provide orientation to policies, procedures, and expectations of the county and/or contract agency relevant to the provider which include:
  - ✓ Client's and provider's rights and responsibilities
  - ✓ Procedures for billing and payment
  - ✓ Record keeping and reporting
  - ✓ Procedures for arranging backup
  - ✓ Agency contact person

### **Requirements When Contracting With An Agency To Provide SHC**

- Training and certification of provider
- Comparability of training, if allowed by the county
- Payment and billing procedures
- Covered services
- Emergency and back-up services